

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Evergy)
Metro, Inc. d/b/a Evergy Missouri Metro)
and Evergy Missouri West, Inc. d/b/a)
Evergy Missouri West for an Accounting) File No. EU-2020-0350
Authority Order Allowing the Companies to)
Record and Preserve Costs Related to)
COVID-19 Expenses)

**THE NATIONAL HOUSING TRUST'S
APPLICATION TO INTERVENE OUT OF TIME**

COMES NOW, the National Housing Trust (“NHT”), and pursuant to 20 CSR 4240-2.075, applies to intervene out of time in the above case. For its Application, NHT states:

1. The National Housing Trust (NHT) is a not-for-profit organization located in the District of Columbia at 1101 30th Street, NW, Suite 100A, Washington, DC 20007. NHT is dedicated to protecting and improving existing multifamily affordable housing so that low-income individuals and families can live in quality neighborhoods with access to opportunities. As a leading affordable housing policy institution, NHT works to ensure that low-income renters can benefit from energy efficient, healthy homes. NHT has long recognized that keeping energy costs low in multifamily housing is critical to maintaining affordable homes for low-income families. Together with its partners, NHT has been working to overcome the challenges to serving the multifamily housing sector with utility energy efficiency resources. In recognition of its leadership in this field, NHT was named the 2014 Andromeda Star award recipient by the Alliance to Save Energy.

2. NHT has been engaged in issues relating to affordable housing, energy efficiency, and low-income Missourians for several years, including in Evergy territory. NHT has an interest

in Evergy's recovery of revenues lost due to the COVID-19 pandemic, and its impact on Missouri's most vulnerable consumers and their access to essential, affordable utility service. As advocates for affordable housing and energy efficiency, NHT's interests are different than those of the general public and may be adversely affected by a final order arising from this case.

3. Granting NHT intervention will serve the public interest by assisting the Commission's record for decision in this case, and no party will be adversely affected by such intervention.

4. NHT also requests that it be permitted to intervene in this case after the deadline for intervention, pursuant to the Commission's rules. Rule 4 CSR 240-2.075(10) states:

Motions to intervene or add new member(s) filed after the intervention date may be granted upon a showing of good cause. Any motion so filed must include a definitive statement whether or not the entity seeking intervention or to be added as a new member accepts the record established in that case, including the requirements of any orders of the commission, as of the date the motion is filed.

5. Good cause exists to grant intervention because both counsel and staff were unable to submit an application on June 1st due to other obligations that arose.

6. NHT has not yet taken a position in this case, but accepts the record established in this case as of the date of this intervention.

7. Pleadings, notices and other correspondence in this case should be directed to:

And to:

Andrew J. Linhares
Renew Missouri
3115 Grand Ave, Suite 600
St. Louis, MO 63118
(314) 471-9973
andrew@renewmo.org

Annika Brink
Midwest Director of Energy Efficiency Policy
The National Housing Trust
(202) 333-8931 x141
abrink@nhtinc.org

WHEREFORE, the National Housing Trust respectfully requests that the Commission grant this *Application to Intervene Out of Time*, along with any further relief the Commission deems proper.

Respectfully,

/s/ Andrew J. Linhares

Andrew J. Linhares, MO Bar ID #63973

3115 Grand Ave, Suite 600

St. Louis, MO 63118

(314) 471-9973

andrew@renewmo.org

ATTORNEY FOR THE NATIONAL
HOUSING TRUST

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 2nd day of June 2020:

/s/ Andrew Linhares